



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

August 15, 2017

Alice Glasner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
VIA E-MAIL

Re: Comments on the CPUC/CEC Joint Staff Draft Proposal for the SB 350 Disadvantaged Communities Advisory Group Structure and Framework

Dear Ms. Glasner:

The BlueGreen Alliance (BGA) respectfully submits these comments in response to the California Public Utilities Commission's and California Energy Commission's Joint Staff Draft Proposal for the structure and framework of the SB 350 Disadvantaged Communities Advisory Group.

Generally, BGA recommends that the Advisory Group's guiding principles and/or scope of responsibilities include expanding access to high-road, family-sustaining jobs in clean energy and energy efficiency programs for low-income households, disadvantaged communities and those with barriers to employment.

The SB 350 Low Income Barriers Studies (both Parts A and B) recognize the importance of ensuring low income residents have access to economic opportunities generated from California's investments in the clean economy.¹

As SB 350 has recognized, climate policy should aid the state's most environmentally impacted and socioeconomically disadvantaged communities. It should do so by including greater economic equity through access to good jobs in clean economic growth sectors. This can include:

- Increasing the number and quality of jobs and training opportunities with career pathways across California in clean energy and climate/environmental protection, particularly in GGRF-funded programs and projects.
- Increasing the share of work carried out by residents from low-income households and disadvantaged communities and those with barriers to employment (e.g. low-income, formerly incarcerated, homeless, etc.); and by diverse business enterprises (DBE).
- Supporting small, diverse-owned businesses that want to thrive in a high-road market.

¹ See Principal Recommendation 3 (p. 6-7) of the SB 350 Low-Income Barriers Study, Part A - Commission Final Report, December 12, 2016, http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214830_20161215T184655_SB_350_LowIncome_Barriers_Study_Part_A_Commission_Final_Report.pdf and "Maximizing Economic Opportunities and Benefits for Low-Income Residents from Investments in Clean Transportation and Mobility Options" (p. 47-48, 55) of the Draft Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents, April 12, 2017, https://www.arb.ca.gov/msprog/transoptions/draft_sb350_clean_transportation_access_guidance_document.pdf

In response to Joint Staff Draft Proposal Question 3 (specific programs and policies), BGA recommends the Advisory Group's focus include access to high-road, family-sustaining jobs for those from disadvantaged communities. It is important to note that access to jobs for those from disadvantaged communities need not be limited to clean energy and energy efficiency programs intended to provide services and technologies to disadvantaged communities.

BGA appreciates the opportunity to comment on to the Joint Staff Draft Proposal and looks forward to the formation of the Disadvantaged Communities Advisory Group. Should you have any questions, please feel free to contact me (rossn@bluegreenalliance.org, 415-216-5750).

Sincerely,

Ross Nakasone
California Policy Organizer